

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
ALEXANDER BROMBERG AND
VERA BROMBERG

PLAINTIFF'S ADDRESS : 2251 EAST 65th
STREET, BROOKLYN, N.Y. 11234

Plaintiff(s)

-against-

SUMMONS WITH NOTICE

Index No.: 7802 2014

TRIAL BY JURY DEMANDED

MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC., INDYMAC MORTGAGE
SERVICES, AND
ONE WEST BANK FSB

Defendant(s)

KINGS COUNTY CLERK
RECEIVED
MAY 23 PM 2:52

-----X
TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED TO APPEAR AND PROVIDE YOUR NOTICE OF APPEARANCE AND DEMAND FOR COMPLAINT TO BE FILED AT THE SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF KINGS, AT THE OFFICE OF THE COUNTY CLERK OF SAID COURT, AT 360 ADAMS STREET, BROOKLYN, NEW YORK 11201, IN THE COUNTY OF KINGS, CITY AND STATE OF NEW YORK, BY AN ATTORNEY ADMITTED TO PRACTICE IN THE STATE OF NEW YORK, WITHIN THE TIME PROVIDED BY NEW YORK LAW, AS NOTED BELOW, AND TO SERVE YOUR NOTICE OF APPEARANCE, THIS TRANSACTION BEING CLEARLY ENCOMPASSED BY LONG ARM JURISDICTION, CIVIL PRACTICE LAW AND RULES ("CPLR") SECTION 302 (a) (1); AND DEMAND FOR COMPLAINT, UPON THE UNDERSIGNED PLAINTIFFS' ATTORNEYS, THE LAW OFFICES OF STEPHEN ("SHLOMO") G. DICKERMAN, JD., LL.M., ESQ. AT THE ADDRESS SPECIFIED BELOW.

NATURE OF THE CAUSE OF ACTION AND DAMAGES

(a) Action for DECLARATORY JUDGMENT AND INJUNCTIVE RELIEF as more fully set forth in PLAINTIFFS' VERIFIED COMPLAINT TO BE SERVED AND FILED PURSUANT TO NOTICE OF APPEARANCE AND DEMAND FOR COMPLAINT AS AFORESAID; OR IN THE EVENT OF DEFAULT AT INQUEST HEARING;
AND

(b) Such other cause of action or causes of action to be set forth in such verified complaint, or during testimony at inquest hearing, in accordance with Plaintiffs' attorneys' further filing of any and all legal documents;

(c) breach of contract, and/or agreement, and accord and satisfaction pursuant to satisfaction of mortgage, as set forth on Exhibit "A" annexed hereto and made an integral part and parcel hereof.

RELIEF REQUESTED:

(a) Declaratory Judgment and/or Order determining that any mortgage presently on record at the County Clerk of the City of New York, County of Kings, or at the Registrar of the City of New York, County of Kings, or other official record keeping or real estate registration office or system of the City of New York, County of Kings, be declared void and unenforceable, and authorizing plaintiffs' sale of the subject premises without any lien upon plaintiffs' title thereto, or similar language to be determined by a Justice of the Supreme Court of the State of New York, County of Kings;

(b) Injunctive Relief in favor of Plaintiffs prohibiting Defendants or either of them from commencing foreclosure proceedings, based upon satisfaction, lack of standing, prohibition of assignment, and governing precedent or decisions providing guidance in cases of Mortgage Electronic Registration Systems Inc.; and such other bases as Plaintiffs by counsel may set forth in a future legal document;

and for such other, and further, relief which the COURT AND / OR JURY may determine at the time of trial, inquest, or otherwise.

UPON YOUR FAILURE TO APPEAR, JUDGMENT WILL BE THE SUBJECT OF A NOTICE OF INQUEST, FOR JUDGMENT TO BE TAKEN AGAINST YOU, OR COURT ORDER ISSUED, FOR THE RELIEF DEMANDED IN THIS SUMMONS WITH NOTICE TOGETHER WITH ALL COSTS, AND DISBURSEMENTS OF THIS ACTION.

Note: The law provides that:

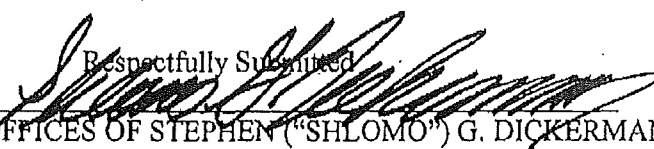
(a) If this summons is served by its delivery to you personally within the State of New York, you must appear and answer within TWENTY (20) days after such service; or

(b) If this summons is served by any means other than personal delivery to you within the State of New York, including but not limited to the Office of the Secretary of State, or other state official or office which is a lawful means of service of process under the laws of the state in question, you must appear and answer within THIRTY (30) days after proof of service thereof is

filed with the Clerk of this Court.

Dated: BROOKLYN, N.Y.
MAY 21, 2014

Respectfully Submitted


LAW OFFICES OF STEPHEN ("SHLOMO") G. DICKERMAN
JD., LL.M., ESQ.

ATTORNEYS FOR PLAINTIFFS
KINGS COUNTY OFFICE AND P.O. ADDRESS
128 BRIGHTON 11th ST., SUITE # 1,
BROOKLYN, N.Y. 11235
(TEL) 718-337-8766

TO: MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS INC., LENDER
CARE OF NATIONWIDE TITLE CLEARING, 2000 ALT 19 NORTH
PALM HARBOR, FLA. 34683
SERVICE OF PROCESS THROUGH SECRETARY OF STATE OR OTHER MEANS
UNDER APPLICABLE STATE LAW

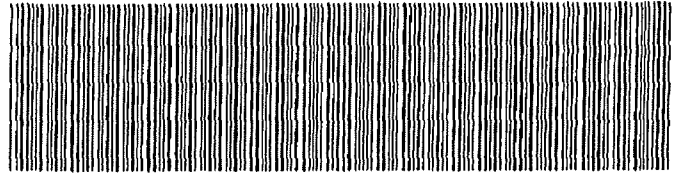
INDYMAC MORTGAGE SERVICES, 2900 ESPERANZA CROSSING, INDY MAC-4
AUSTIN, TEXAS, 78758
SERVICE OF PROCESS THROUGH SECRETARY OF STATE OR OTHER MEANS
UNDER APPLICABLE STATE LAW

ONE WEST BANK, FSB, 888 EAST WALNUT STREET, PASADENA, CALIF. 91101

SERVICE OF PROCESS THROUGH SECRETARY OF STATE OR OTHER MEANS
UNDER APPLICABLE STATE LAW

**NYC DEPARTMENT OF FINANCE
OFFICE OF THE CITY REGISTER**

This page is part of the instrument. The City Register will rely on the information provided by you on this page for purposes of indexing this instrument. The information on this page will control for indexing purposes in the event of any conflict with the rest of the document.


2012061200643001001EF4A5
RECORDING AND ENDORSEMENT COVER PAGE
PAGE 1 OF 3
Document ID: 2012061200643001
Document Date: 06-12-2012
Preparation Date: 06-12-2012
Document Type: SATISFACTION OF MORTGAGE
Document Page Count: 1
PRESENTER:

NATIONWIDE TITLE CLEARING
2100 ALT 19 NORTH
PALM HARBOR, FL 34683
727-771-4000
derrick_white@nwtc.com

RETURN TO:

NATIONWIDE TITLE CLEARING
2100 ALT 19 NORTH
PALM HARBOR, FL 34683
727-771-4000
derrick_white@nwtc.com

PROPERTY DATA

Borough	Block	Lot	Unit	Address
BROOKLYN	8632	44	Entire Lot	2251 EAST 65TH STREET

Property Type: 1-2 FAM WITH ATTCH GAR &/OR VACANT LAND

CROSS REFERENCE DATA
CRFN: 2006000317067
PARTIES
MORTGAGER/BORROWER:
ALEXANDER BROMBERG

MORTGAGEE/LENDER:
MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC

x Additional Parties Listed on Continuation Page

FEES AND TAXES

Mortgage		Filing Fee:	
Mortgage Amount:	\$ 0.00		\$ 0.00
Taxable Mortgage Amount:	\$ 0.00	NYC Real Property Transfer Tax:	\$ 0.00
Exemption:			\$ 0.00
TAXES: County (Basic):	\$ 0.00	NYS Real Estate Transfer Tax:	\$ 0.00
City (Additional):	\$ 0.00		\$ 0.00
Spec (Additional):	\$ 0.00		
TASF:	\$ 0.00		
MTA:	\$ 0.00		
NYCTA:	\$ 0.00		
Additional MRT:	\$ 0.00		
TOTAL:	\$ 0.00		
Recording Fee:	\$ 42.00		
Affidavit Fee:	\$ 0.00		

**RECORDED OR FILED IN THE OFFICE
OF THE CITY REGISTER OF THE
CITY OF NEW YORK**

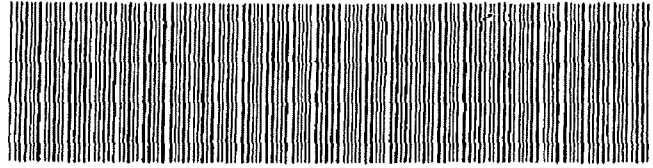
Recorded/Filed 06-26-2012 11:08
City Register File No.(CRFN):
2012000251458



Annette McMillan

City Register Official Signature

NYC DEPARTMENT OF FINANCE
OFFICE OF THE CITY REGISTER



2012061200643001001CF625

RECORDING AND ENDORSEMENT COVER PAGE (CONTINUATION) PAGE 2 OF 3

Document ID: 2012061200643001

Document Date: 06-12-2012

Preparation Date: 06-12-2012

Document Type: SATISFACTION OF MORTGAGE

PARTIES

MORTGAGER/BORROWER:
VERA BROMBERG

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
ALEXANDER BROMBERG AND
VERA BROMBERG,

Index No.:

Plaintiffs,

-against-

SUMMONS WITH NOTICE

MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC.,
INDYMAC MORTGAGE SERVICES, AND
ONE WEST BANK, FSB

Defendant.
-----X

SUMMONS WITH NOTICE

STEPHEN ("SHLOMO") G. DICKERMAN, JD., LL.M., ESQ.
ATTORNEY FOR PLAINTIFFS
OFFICE & P.O. ADDRESS
128 BRIGHTON 11th STREET, SUITE 1
BROOKLYN, N.Y. 11235
(T) 718-337-8766

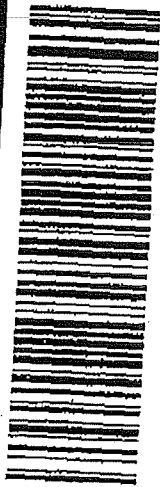
To the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions therein are not frivolous as defined in subsection (c) of Section 130-1.1 of the Rules of the Chief Administrator (22NYCRR).


STEPHEN (SHLOMO) G. DICKERMAN, JD., LL.M., ESQ.

MARK McCLOSKEY

P.O. Box 130
Burnt Hills, NY 12027

UNITED STATES POSTAL SERVICE
REGISTERED MAIL

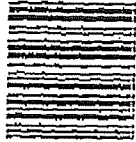


RE 675 049 763 US

Label 200, August 2005 PSN 7530-03-000-0311



1000



91101

U.S. POSTAGE
PAID
BURNT HILLS, NY
12027
JUN 11, 14
AMOUNT

\$15.35
00040304-07

One West Bank FSB
888 East Walnut Street
Pasadena, CA 91101

RECEIVED
JUN 11 2014
BURNT HILLS, NY

AFFIDAVIT OF SERVICE

3002242455 - DB -
CCWEN5/RSTATE OF NEW YORK
COUNTY OF KINGS

SUPREME COURT FILED ON: 05/23/2014 INDEX NO.: 7802

ALEXANDER BROMBERG AND VERA BROMBERG

Plaintiff(s)-Petitioner(s)

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., et al

Defendant(s)-Respondent(s)

STATE OF NEW YORK
COUNTY OF SARATOGA ss.}

I, Mark E. McClosky being duly sworn, deposes and says that deponent is over the age of eighteen years, is not a party in this proceeding and resides in New York State.

On JUNE 11, 2014 at 1:10 P.M.
Deponent served two true copies of SUMMONS WITH NOTICE

RECEIVED

bearing index number: 7802 and date of filing: 05/23/2014
upon ONE WEST BANK FSB
at address: SECRETARY OF STATE, 99 WASHINGTON AVENUE
city and state: ALBANY, NY 12210JUN 20 2014
CAT MAIL
LEGAL DEPTMANNER OF SERVICEPERSONAL

- ☐
- By delivering to and leaving with personally known to the deponent to be the same person mentioned and described in the above proceeding as the person to be served.

SUITABLE AGE PERSON

- ☐
- By delivering and leaving with personally at the premises mentioned above. Such person knowing the person to be served and associated with him/her, and after conversing with him/her, deponent believes him/her to be a suitable age and discretion.

AUTHORIZED AGENT

- ☒
- By delivering and leaving 1 copy with CHAD MATICE, BUSINESS DOCUMENT SPECIALIST the agent for service on the person in this proceeding designated under Rule 307 BCL and tendering the required fee. Service having been made to such person at the place, date and time above.

AFFIXING TO DOOR, ETC.

- ☐
- By affixing a true copy of each to the door of the actual place of business, dwelling place or usual place of abode stated above. Deponent was unable with due diligence to find the proper or authorized person to be served, or a person of suitable age and discretion at the actual place of business, dwelling place or usual place of abode stated above after having called there on the following dates and times:

MAILING

- ☒
- Deponent completed service by depositing a true copy of each in a postpaid, properly addressed envelope in an official depository under the exclusive care and custody of the United States Postal Service. The package was labeled "Personal & Confidential" and mailed to the person stated above at address 888 EAST WALNUT STREET PASADENA, CA 91101 on 6/11/2014. The envelope did not indicate on the outside that the communication was from an attorney or concerned an action against the recipient. The envelope was mailed by first class mail certified mail X registered mail X return receipt requested. Certified or Registered number: RE 675 049 763 US

Deponent further states upon information and belief that said person so served is not in the Military service of the State of New York or the United States as the term is defined in either State or Federal statutes.

DESCRIPTION deponent describes the person actually served as:Sex: MALE Race/Skin Color: WHITE Hair Color: BLACK
Approximate Age: 35 years Approximate Height: 6'1" Approximate Weight: 225 pounds
Other:

Subscribed and sworn before me on} JUNE 11, 2014

Notary Public, State of New York
Karen E. Rock
Qualified in Schenectady County
Number 01R06065213
Expires: October 9, 2017Attorney:
Law Offices of Stephen ("Shlomo")
G. Dickerman, JD., LL.M., Esq.
128 Brighton 11th Street, Suite 1
Brooklyn, NY 11235
(718) 337-8766Mark E. McClosky
Deponentaffidavit #: 79434
NLS#: 14-4405

FIRM FILE # 419558